UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August 25, 2006

Anne Hassoun
Project Manager
District of Columbia Department of Transportation
64 New York Avenue
Washington DC 20002

Subject: 11th Street Bridges Project, Anacostia Freeway (I-295/DC 295) to the Southeast/Southwest Freeway (I-695), Washington, DC. CEQ# 20060268

Dear Ms. Hassoun:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the 11th Street Bridge Draft Environmental Impact Statement (DEIS). The DEIS was prepared by the District of Columbia Department of Transportation (DDOT) and the Federal Highway Administration (FHWA).

The proposed project will reconstruct and reconfigure the interchange of the Southeast/Southwest Freeway and the Anacostia Freeway over the Anacostia River in Southwest Washington DC. The project purpose is to reduce congestion and improve traffic across the Anacostia River on the 11th Street Bridges and on surrounding local streets and increase safety of vehicular, pedestrian and bicycle traffic. The project is also intended to replace deficient infrastructure and roadway design and improve transportation needs for the District, create another emergency evacuation route for the District, and provide better infrastructure for the Anacostia waterfront revitalization. The project will reconstruct the two bridges, and reconfigure interchanges to and from the bridges. There will also be the addition of wide, shared-use paths for pedestrian use tied into existing trails on both sides of the river.

There are four build alternatives (Build Alternatives I – IV) proposed by the project, and a no action alternative. Build Alternatives I, II, and III would provide a new eight-lane freeway bridge along the alignment of the existing 11th Street Bridge as well as a new, local four-lane bridge crossing on the current alignment of the Officer Welsh bridge. Build Alternative I would depress the Anacostia Freeway in a tunnel below the water level, and would not provide a direct access for traffic from the Anacostia neighborhood to the Anacostia Freeway. Build alternative IV would barrier separate local and freeway traffic on eight freeway lanes and four local lanes.

The environmental impacts of the 11th Street Bridge project are generally similar for all four build alternatives. Environmental impacts include noise impacts from the

project and project construction, impacts to wetlands and water quality and subsequent affects to aquatic habitat from construction. Socio-economic impacts include traffic impacts due to construction, the possible displacement of a boat house operated by the Anacostia Community Boathouse Association (ACBA), reduction in park spaces, economic land use impacts, and visual impacts.

A preferred alternative has not been identified in the DEIS. EPA rates all of the build alternatives EC-2, environmental concerns, insufficient information, based mainly on the lack of a selected preferred alternative and the resultant insufficient information provided on mitigation measures. A copy of the EPA EIS rating system is enclosed for your information. EPA was not able to fully evaluate mitigation proposals for the alternatives because specific details of the impacts will be provided once the preferred alternative is selected.

As mentioned above, all of the build alternatives generally will cause the same environmental impacts with the differences between the build alternatives being mainly in the Socio economic impacts between the alternatives. A comparative evaluation of the impacts among the alternatives may identify an alternative that would have slightly less of an environmental impact. For example build alternative I may arguably be the alternative with the least environmental impact of the 4 build alternatives. However there may be other considerations such as community concerns or traffic flow that would minimize the differences comparatively. It is anticipated that upon the selection of the preferred alternative mitigation of the impacts will be fully detailed. We would expect a more complete discussion of the mitigation required to offset the impacts of this project once a preferred alternative is selected and the impacts completely evaluated.

General Comments

As noted previously, without the identification of a preferred alternative in the DEIS, many of the mitigation measures identified throughout the document are general in nature and will be more fully evaluated in the Final Environmental Impact Statement (FEIS). EPA understands that this approach was adopted to fully identify community concerns of all of the alternatives and appreciates that this approach will give the community an unbiased discussion of the alternatives from which they can be evaluated. However without the preferred alternative identified and the details of its implementation in the DEIS some issues and impacts need to be further developed in the FEIS.

We commend to project sponsors in their commitment to implementing Low Impact Development (LID) techniques in the design of this project. LID techniques have the potential to reduce the runoff of pollutants to the Anacostia River and should be fully implemented for this project. The Region will offer any assistance required to fully implement LID for this project.

Detail Comments

Section 2.4 - Reasonable Alternatives Considered. Was the DC department of planning involved in the planning and review process of the EIS?

Section 2.5 - Environmental Impacts. We agree with the general concept that all of the build alternatives have similar impacts but there are some differences that may be worth noting. For example there is approximately a 10 acre difference in footprint among the alternatives and there is a 2 acre difference in parkland impacts among the alternatives.

Exhibit 2-4 - The impact tables were very helpful and well thought out.

Section 5.4.3 - Bridge demolition. EPA has experienced in other bridge construction projects, impacts to aquatic species as the result of sheet piling installation and bridge pier construction. Most notably during the Woodrow Wilson Bridge project there have been instances of fish kills due to pier construction. We would ask that these instances be reviewed and appropriate precautions be incorporated into this design.

Section 7.2.1 page 7-7 - Does the No build alternative include maintenance for the existing roadway. If so the conclusion provided in the second sentence may not be accurate.

Section 7.2.2 page 7-10 - Impacts to parks and recreation facilities are estimated to 9 and 11 acres depending on the build alternative. It is stated that these impacts could be further reduced with the use of retaining walls. EPA supports minimizing these impacts if possible.

Section 7.3.5. - It appears that only one property will be affected or need to be relocated as a result of the project. As indicated in section 7.3.5 this property, the ACBA boat house, is eligible for treatment under the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 and negotiations are required to address relocation issues and just compensation with the affected persons. These negotiations will occur once the preferred alternative is identified. It is recommended that these negotiations address temporary relocation aspects that will be required during construction as well as permanent relocation if necessary and that the FEIS elaborate on any remaining negotiations or assurances required to meet the goals of the Uniform Relocation Assistance and Real Property Acquisition Act.

Section 7.5.1 - Air Quality Impacts. Since the conformity analysis has not been completed for this project EPA would expect the following information be provided.

In accordance with FHWA guidance on conformity analysis, the final EIS should document compliance with requirements of all applicable environmental laws, Executive Orders, and other related requirements, including the transportation conformity provisions of the Clean Air Act. However, the regulations also recognize that if full compliance is not possible by the time the final EIS is prepared, the final EIS can reflect

consultation with the appropriate agencies and provide reasonable assurance that the requirements will be met.

In those instances when the final EIS does not document full compliance with the transportation conformity provisions, it should at a minimum:

- Document all pertinent consultation and information that supports the reasonable assurance that all of the transportation conformity requirements will be met.
- Discuss the procedural steps that remain in order for all of the transportation conformity requirements to be met. This discussion should include any interagency consultation that must still occur and information that must be provided, as well as the opportunities for public review and comment that will take place.
- Document hot-spot analyses (40 CFR 93.116) in non-attainment and maintenance areas for carbon monoxide and particulate matter with diameters of 10 micrometers or less (PM-10), including any required quantitative and qualitative analyses, any mitigation measures that are needed, and the enforceability of any such mitigation measures (40 CFR 93.125).
- Document compliance with any PM-10 control measures in the applicable implementation plan (40 CFR 93.117) in PM-10 non-attainment and maintenance areas that are relevant to construction or operation of the project.

Section 7.6 - Noise, page 7-41. The document states that a traffic noise impact is considered to occur if noise levels approach or exceed the Noise Abatement Criteria or if substantial increases over the existing condition occur (an increase of 10 dBA or more) An increase of 10 dBA is a Federal Highway criteria, some States use a 5 dBA criteria as the increase over existing conditions to determine an impact. Does DDOT or the District impose the 5 dBA criteria and if so how would this change the noise analysis? EPA is concerned with the specific noise impacts that may occur and looks forward to the review of the proposed mitigation for the preferred alternative once selected.

Section 7.72, page 7-55 - Reducing the impacts of stormwater is a very important consideration for Highway transportation projects and an important EPA initiative. Could you estimate the reduction of stormwater impacts of this project by implementing Low Impact Development techniques and other BMPs that will be implemented to reduce stormwater runoff? If possible please elaborate or provide examples of some LID practices that could be applied to this project.

Section 7.8.4 and 7.8.5 -Wetlands Impacts and mitigation; Indirect and cumulative impacts. We are concerned with the approach of using storm water management for wetlands mitigation. Although we encourage stormwater management and Low impact development it is not intended to be mitigation for wetlands impacts. We suggest that this issue be coordinated with the Corps and our EPA wetlands program and this section be restated to indicate appropriate mitigation for the loss of function will be achieved.

Section 7.9.4 and 7.9.5. - The DEIS states that 8 acres of naturalized habitat would be affected by the 11 street bridge project. While there may not be any Federal requirement for mitigation we strongly support any effort that would restore this naturalized area especially in light of the minimal type of this habitat in an urban setting. As you may know some of the Chesapeake Bay program Keystone commitments target the conservation of existing forests along all streams and shorelines and to correct the nutrient- and sediment-related problems in the Chesapeake Bay and its tidal tributaries. Any effort that would support these goals would be appreciated.

Editorial comments

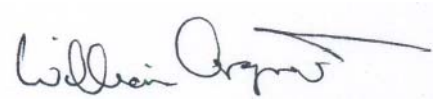
Please include a list of the appendix in the table of contents of Volume 1

Section 6.9.4 page 6-82. The exhibit referenced should be 6-53 instead of 6-57.

Section 7.5.2 page 7-25. The maximum CO concentration mentioned in the text may be 3.2 ppm vs. 3.0 ppm

We are very appreciative of the proactive approach taken in the development of this EIS and the efforts, through several meetings, of providing information in support of this project review. Thank you for the opportunity to provide comments on the DEIS. Should you have any questions regarding our comments concerning the NEPA process, please contact me at 215-814-3367.

Sincerely,



William Arguto
NEPA Team Leader

Enclosure